

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

GEORGE DC PARKER II and LORI A.)
PARKER,)
)
Plaintiff(s),) No. 3:23-cv-05069-RJB
)
)
vs.)
)
)
THE SOCIETY FOR CREATIVE)
ANACHRONISM, INC., a/k/a/)
"SCA" or "SCA, Inc.", et.al,)
)
Defendant(s).)

VIRTUAL REMOTE DEPOSITION OF
LORI PARKER

9:00 a.m.

JANUARY 5, 2024

Virtual Zoom Deposition

Washington State

REPORTED BY: ANITA MITCHELL, CSR No. 2586

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1 high-level question. I don't want to get into the weeds
2 and details of this. It's really just, I kind of want
3 more like a bullet point list, and I say that before I
4 ask the question, so you can understand what I'm looking
5 for, before you start answering. When I ask the
6 question, you may want to start answering, but I want to
7 give you more structure first, okay?

8 A. All right.

9 Q. Now, what I want to know is, I want to know each
10 of the specific issues you take with the SCA as it
11 relates to this lawsuit. I want you to identify each of
12 the items that you believe constitutes either the
13 negligence or hostile work environment or whatnot,
14 related to the SCA. I want bullet points, you know,
15 that these are the issues that I'm taking, and then I
16 can dive into them on an individual basis. I just first
17 want the complete list. That way I don't forget to talk
18 about anything, and I can make sure you have a chance to
19 be heard. Does that make sense?

20 A. Yes, it does. Because I'm probably going to
21 forget something, so you know. I will be very clear
22 about the fact that this may not be a complete list,
23 however, so let me -- I don't know how to phrase the
24 answer. I'm struggling with how to approach the answer
25 to this.

1 The issues that we have are the hostile work
2 environment, as you mentioned, and the circumstances
3 surrounding my release from the Kindom YAFA Officer.
4 YAFA is Y-A-F-A Officer, and that is an acronym for
5 Youth and Family Achievement Officer.

6 The lack of protections that were given when
7 George and I were harassed by a peer, the outcomes of
8 the investigation on that, the circumstances surrounding
9 the Baronial polling in general, and specifically, the
10 attacks that were made on us. And then finally, of
11 course, the business with George's exile and later his
12 R&D, his Relocation and Denial of membership.

13 Q. Okay.

14 A. That's broad.

15 Q. 100 percent. I wanted the broad strokes, and
16 that way, I can come back and we can discuss them a
17 little more in detail now. I wanted to get the broad
18 brush strokes, that these are the major complaints I
19 have.

20 And as we're talking about these, if you go, oh,
21 my goodness, this reminds me, I also have this issue.
22 Please consider this kind of an open-ended question
23 throughout this deposition. If at any point you go --
24 you remember an additional term or additional item,
25 please throw it out because this is my opportunity to

1 your recollection at this point. If you have a document
2 that says it's a slightly different date, you know, that
3 doesn't bother me. I get it.

4 Q. And the Society-level YAFA position, was that a,
5 was that a paid position?

6 A. No.

7 Q. It was a volunteer position?

8 A. Yes.

9 Q. Did you consider your position to be somewhat
10 educational in nature, that YAFA position?

11 A. Absolutely.

12 Q. Because you were helping to educate youth in, you
13 know, issues surrounding the, the Middle Ages and arts
14 and crafts, and that sort of thing, right?

15 A. Yes, that's exactly right.

16 Q. And in fact, that's one of your passions, is
17 instructing youth; is that fair?

18 A. Yes, that's fair.

19 Q. Now, when you moved into the Society-level YAFA
20 position, did you, you know, were there, were there any
21 actions that you considered to be, you know, hostile
22 towards you, in regard to that position. And I want to
23 separate that out from, say, some of the other personal
24 interactions that were not related to your YAFA
25 position, that we'll talk about later, if that makes

1 somebody, they're making you feel uncomfortable, and
2 then prove it.

3 Q. So it sounds like it was more passive-aggressive
4 conduct that you're preferring to; is that fair?

5 A. That's a very good, very good way to describe it.
6 Very passive-aggressive, yes.

7 Q. Now -- okay, so as it relates again to the
8 Society-level YAFA position, is there anything else
9 about that position or any other conduct that you
10 believe constitutes a, a hostile work environment?

11 A. Once I made it into the Society position, I
12 cannot recall anything specific. The hostile work
13 issues were centered on my time as Kingdom Officer.

14 Q. Now, I do want to talk about those issues, you
15 know, briefly, just to make sure I understand. I want
16 to make sure I understand. You can have a chance to
17 tell me your side of the story. That's what I'm here
18 for.

19 The hostile work environment, in regard to the
20 Kingdom YAFA position, that's what your claim is about,
21 right?

22 A. Yes.

23 Q. And you briefly described for me the issue with
24 not the original person who appointed you, but the
25 following seneschal for the Kingdom, and you know,

1 A. Um, in her e-mail, I believe that she specified,
2 without going back to confirm this, I believe she
3 specified other officers.

4 Q. And then again, we discussed that you, you took
5 that issue up with your superior at the Society-level,
6 and he recommended that you not pursue it at the
7 Kingdom-level because he would be retiring soon and you
8 would be moving into the Society-level YAFA position; is
9 that fair?

10 A. Essentially yes, that's fair.

11 Q. Okay. And that was the path you took at that
12 time, right?

13 A. Yes.

14 Q. Okay. Now I want to shift gears to the next
15 issue, which I seem to recall was lack of protection
16 from harassment from, from a peer or peers. And by
17 that, I don't mean like your peer, as in another person
18 on your same level, but peers of the realm, you know,
19 the officers at the Kingdom-level in An Tir; is that
20 fair?

21 A. I am going to correct you.

22 Q. Please do.

23 A. Huge within the Society, it is a Society-level
24 award given by Kingdoms, so it holds status within the
25 Society as a whole. However, they're not officers, but

1 Duchess after they've been King or Queen for two times,
2 and then they get that title. That sort of thing,
3 right?

4 A. Yes, yes. The King and Queen are the ones who
5 give all the titles to participants, and I will help you
6 out here, because I know you're not part of this. The
7 peerage circles are the groups of peers. They advise
8 the King and Queen. You become a peer if you exhibit
9 peer-like qualities, which is quote/unquote, "peer-like
10 qualities."

11 And once you obtain those peer-like qualities,
12 according to the people in the circle, then the King or
13 Queen may bestow upon you the peerage.

14 Q. I understand. And then there is a couple of
15 titles that are bestowed upon somebody, not necessarily
16 because the peerage circle, but because of the
17 accomplishment, for example, the King or Queen for two
18 different reigns, become Duke or Duchess, right?

19 A. Yes.

20 Q. Thank you for that clarification. I really do
21 appreciate it.

22 Okay. So now I want to, now that I understand
23 peerage a little bit better, I want to make sure I
24 understand the, the harassment that you contend you were
25 not protected from, in relationship to actions, I

1 believe you said of peers. Which specific individuals
2 are you asserting were, were harassing you and you
3 weren't protected from?

4 A. The major one was -- her name is Raphealla Di
5 Contino, and again her, her legal name is different, and
6 I have it somewhere in my notes, but I don't remember
7 what it was.

8 Q. It's okay. Is there a short term for Raphealla,
9 that we could use, that would be easier for the court
10 reporter to write down?

11 A. We can just use Raphealla.

12 Q. Okay. And so you said Raphealla was the major
13 one. Were there other minor ones that I should be
14 taking note of? We'll do the deep dive on Raphealla.

15 A. I do believe the current -- no, I don't think
16 they're current anymore. The Baron and Baroness who
17 were current at the time of the polling were also
18 participants, and the seneschal of the Barony, who was
19 also a peer.

20 Q. Okay. And from an organizational standpoint,
21 because there are many layers of seneschals, you have
22 the Society-level seneschal, right?

23 A. Um-hum, yes.

24 Q. And then at the Kingdom-level, there is a Kingdom
25 Seneschal, right?

1 The issues with this, this meeting were, you and
2 George felt personally attacked by Raphealla, right?

3 A. Yes.

4 Q. And the specific issues were her assertion that,
5 that George was a Nazi, that you were abusive or
6 aggressive and failed to have peer-like qualities,
7 right?

8 A. Those are probably the high points.

9 Q. Yeah. And there may be some more granular items,
10 and some of which have kind of lost to the ether over
11 time, but broad strokes, those are really the key points
12 that really sit with you, right?

13 A. And I'm going to correct you. Yes, I agree with
14 you, but she said I was abusive, not aggressive.
15 Abusive was the word that she used.

16 Q. Thank you for that clarification. I appreciate
17 that.

18 Did any of the other peers or individuals who
19 were present, did they have any comments or did they
20 speak up at all?

21 A. Not in public.

22 Q. So all of the, the comments and conduct that
23 we're talking about here were comments made by Raphealla
24 alone, and not others; is that fair?

25 A. Yes.

1 Q. Did -- you mentioned that you were there with
2 LaToya, who was one of your friends; is that correct?

3 A. Yes.

4 Q. And did LaToya respond or say anything back to
5 the Raphealla during this interaction?

6 A. Yes, she did. I cannot recall exactly what it
7 was.

8 Q. And this occurred before the voting for -- for
9 the polling, I should say, before the polling for Baron
10 and Baroness in 2018, correct?

11 A. I believe it was 2019.

12 Q. Thank you.

13 A. But I think that -- I'm pretty sure it was 2019
14 that the polling was, and yes, it was in May. I think
15 the polling was in June.

16 Q. Okay. So this event at the -- I don't know if it
17 was a pub or local establishment that you went to, this
18 occurred in May of 2019?

19 A. Yeah.

20 Q. Okay.

21 A. I am almost positive it was 2019.

22 Q. Okay.

23 A. Yes, it was, it was done, what was nominally a
24 pub. Within the event, the group set up a pub in the
25 event. It had open sides, tables. People would come in

1 asked a question, every time we posted anything, the
2 other members of the Barony would immediately start
3 attacking us online, which resulted in the, the feeling
4 that George and I got, that she was continuing to spread
5 her, her foul words because these are people that we had
6 previously had pretty decent relationships with.

7 Q. And did you talk with any of those individuals to
8 find out, you know, why there was that change in their
9 behavior towards you and George?

10 A. Um, we did question a few people that we trusted,
11 their, their take on the situation, and we were told it
12 was directly related to the things that Raphealla was
13 saying, Raphealla was saying.

14 Q. And which individuals were those?

15 A. Heather Vaerewyck and Kevin Wolfe, and I don't
16 remember the other name. I don't remember. I'll come
17 up with it eventually.

18 Q. It's okay. I'm trying to get the best of your
19 recollection.

20 And what kind of attacks were you, were you
21 suffering? When somebody says, "I felt attacked," it
22 could mean a lot of different things. I want to know,
23 to the best of your recollection, what were the actual
24 attacks that you felt you were suffering at that time?

25 A. Well, I had a personal instant message

1 conversation with Jonnalyhn, who was -- her and
2 Francisca would constantly say things like, you know,
3 "You need to leave us alone. We're doing our job. You
4 know, you need to be more accepting."

5 Francisca was a postal carrier at the time and I
6 was asking for reports, and they jumped down my throat
7 because Francisca had a job that she couldn't get to it
8 right away, even though it had been a week.

9 It's just stuff like that, the nit-picking that
10 went on. Nothing that we said was without comment, and
11 their comments were basically negative.

12 Q. So it sounds like it was a lot of, you know,
13 negative comments, putting you off, putting you down in
14 general; is that fair?

15 A. Yes. We're very, again, to you use your word,
16 passive-aggressive behaviors on their part.

17 Q. Were there any comments that were made towards
18 you and George, other than calling George a Nazi and
19 calling you, you know, abusive? Let's set those
20 comments aside. Were there other comments that were
21 made, that you know, would be something that you would
22 consider patently offensive?

23 A. You know, I can't recall the specifics, but I
24 kind of, you know, I'm feeling like yeah, there probably
25 were several that were offensive, as in, they were

1 maligning my position as YAFA Officer.

2 I was also a Baronial Herald at one point, and
3 there was a lot of that passive-aggressive stuff that
4 went on there too. In general, it's hard to be really
5 specific, because it's a couple of years ago now, and
6 it's just this vague feeling of, like I said, every time
7 we said something, somebody would get up there and drag
8 us down.

9 Q. And this feeling that every time you post
10 something publically, others are going to go down there
11 and do their best to generally put you down?

12 A. Yes. In fact, it really felt like, in some
13 respects, it felt like we were being stocked by certain
14 people. Raphealla was one of them. It was like she was
15 setting out to find what we posted, so that she can post
16 something else. It was not confined to the Baronial
17 page, but it was also some of the Kingdom, unofficial
18 Kingdom pages. So we began to feel very targeted, very
19 stocked, very attacked, just in general.

20 Q. Okay. Now, were any of the, the conduct that you
21 felt, you know, constituted the attacks on you, was any
22 of the conduct performed by somebody who was an officer
23 of the SCA or the Kingdom at the time when they engaged
24 in the conduct?

25 A. Yes.

1 in common usage in depositions in general. I know this
2 can be challenging.

3 COURT REPORTER: Thank you.

4 Q. (By Mr. Bolster) Okay. Let's go back to the, I
5 think we were talking about the Instant Message
6 communications that were coming in, and if you can
7 describe that, that would be great.

8 A. Let's see where to pick it up. It wasn't just
9 the IMs and it wasn't just the Facebook messenger. It
10 was, to be clear, that there were Facebook messenger.

11 It was just, you know, random postings like on
12 the unofficial Kingdom page, those things, on the
13 Baronial page, if I posted to, to like the Scribal
14 Group. And so it was, it was a pretty broad list of
15 places that these kinds of things were occurring.

16 Q. And what was being said on those, on those
17 postings?

18 A. You know, it wasn't anything, but again, so this
19 is how they play their game. It was not actionable. It
20 was, like you said, passive-aggressive. It was very
21 passive-aggressive. It was kind of snarky, nothing that
22 you could really sit there and say that this is enough
23 to complain about.

24 Q. And the acts, in totality, you felt that you were
25 being personally singled out and attacked by all these

1 any effect on us in the end, and the Baronial polling
2 that we had done had already taken place, and we had
3 absolutely no intention of ever doing that again. I
4 mean, she could have told us the move was creating hits.
5 I wouldn't have remembered that either.

6 Q. I understand. It does look like, after your
7 concerns were raised, there were some changes made to
8 the Baronial polling process, to align more with the
9 Society-level expectations.

10 A. Fair enough. Like I said, we had no intention of
11 doing anything with any polling, in the future, so if
12 this was -- it wasn't important enough for me to like
13 really pinpoint and recognize.

14 Q. I understand. And then the, the Baronial polling
15 occurred in, in June or July of 2019?

16 A. Yeah. Yeah, that is about right.

17 Q. Okay. And then while this was going on, there
18 was still the complaint, dealing with Raphealla, because
19 the sanctions -- I shouldn't say the sanctions -- the
20 suspension from social media use, that was handed down
21 in about February of 2020?

22 A. Something like that. I mean, again, I would have
23 to really look at my timeline notes, to be specific
24 about the time.

25 Q. Sure.

1 speak to inflation. I can't speak to things like, you
2 know, cost -- availability of product and things like
3 that, that all plays a part in what we spend on any
4 given day. I really couldn't even throw something out
5 there and be respectable about it.

6 Q. Okay. Were there any books that were kept in
7 regard to the business, you know, profit and loss
8 sheets, anything to track how much you spent versus how
9 much you received, anything like that?

10 A. I'm sure that there was at the time, but I know
11 that, as things filtered out, things were filtered out,
12 so anything, anything recent, I mean, there would be
13 nothing for '23 or '22 or '21. I'm not sure how much
14 further back I can really go and get that kind of
15 information, because it's been so long.

16 Q. As we sit here right now, you're not aware of any
17 documents that you could find, that would identify, you
18 know, the profits versus expenses versus -- just these
19 two dates, right?

20 A. Probably not. I mean, again, based on my
21 recollection, right now, I'm not sure I can come up with
22 something.

23 Q. Okay. Now I want to go back to the, the more,
24 you know, personal, emotional impact that this has had
25 on you, okay?

1 behavior was even worse. He made one comment. They
2 made comment, after comment, after comment, until he
3 lost this one.

4 Q. And so it sounds like you don't know exactly what
5 you're asking, related to sanctions against them. You
6 just want something additional to happen to them?

7 A. I want the SCA to handle it. I want the SCA
8 to -- like I said, personally, I want their peerages
9 removed. That's what I want. To me, they are not
10 peers. Their behavior is less than peer-like and there
11 should be ramifications for that.

12 Q. Okay. Thank you. What else are you going to be
13 asking the Court to award you and George?

14 A. You know, we have damages for The Norse Gypsy
15 Forge. We talked a little bit about the money. I don't
16 know if we were clear, but basically we took those
17 dollar amounts, and we tripled it. That's really --
18 that's how it was.

19 You know, it -- the damages to that business are
20 probably irrecoverable. I don't think that we can
21 return to the SCA, even if we wanted to do it full-time
22 in Arizona. I don't think we can return as The Norse
23 Gypsy Forge because of the bad comments, the bad press,
24 the chance for people, from outside of Atenveldt,
25 coming to an event here and trashing our business. They

1 gets really bad every time I have to go through this
2 stuff, because it's anxiety-based, and so yeah, I
3 believe we're entitled to punitive damages. I believe
4 that we have been damaged enough that we deserve
5 something.

6 Q. Okay. Is there any rule or statute that you are
7 relying upon to get punitive damages, because you don't
8 just -- you know, the rules we have, you don't just get
9 punitive damages because you felt like you were damaged
10 and upset. I want to understand what the basis is,
11 other than the emotional --

12 A. Without going back through my paperwork, I don't
13 have anything right off-hand.

14 Q. Okay. You never filed a compliant with the EEOC
15 or the Washington Human Rights Commission, did you?

16 A. No.

17 Q. And you didn't file a complaint with any
18 governmental, you know, United States or state
19 governmental agencies relating to the SCA, did you?

20 A. The only thing that I can recall that we did, is
21 the complaint to the BBC, Better Business Bureau, BBB, 3
22 'B's.

23 Q. BBC -- BBB, Better Business Bureau.

24 A. See.

25 Q. You said "BBC." I got that in mind.

REPORTER'S CERTIFICATE

I, ANITA MITCHELL, the undersigned Certified Court Reporter, pursuant to RCW 5.28.010, authorized to administer oaths and affirmations in and for the State of Washington, do hereby certify that the sworn testimony and/or proceedings, a transcript of which is attached, was given before me via videoconference; that any and/or all witness(es) were duly sworn to tell the truth; that the sworn testimony and/or proceedings were by me stenographically recorded and transcribed under my supervision, to the best of my ability; that the foregoing transcript contains a full, true, and accurate record of all the sworn testimony and/or proceedings given and occurring via videoconference; that a review of which was requested; that I am in no way related to any party to the matter, nor to any counsel, nor do I have any financial interest in the event of the cause.

WITNESS MY HAND AND DIGITAL SIGNATURE THIS
18TH DAY OF JANUARY, 2024.



ANITA MITCHELL, CSR No. 2586